



## U.S. Department of Justice

*United States Attorney  
District of New Jersey*

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October 26, 2021

**VIA E-MAIL and ECF**

Hon. Kevin McNulty  
Federal District Court Judge  
Martin Luther King Building  
50 Walnut Street  
Newark, New Jersey 07102

RE: United States v. Thomas Manzo, Crim. No. 20-555

Dear Judge McNulty:

The Government writes to advise the Court of its position with respect to the recent letter and Proposed Order that was filed in this matter. See Dkt. #58. The Government does not consent to the Court amending the consensual agreement that the parties concurred with as it applies to the case. Mr. Manzo submitted the same letter and Proposed Order to the Government just yesterday afternoon (October 25, 2021) and requested consent to a blanket withdrawal of the Protective Order as to discovery in this matter, so that it may be used in a matter outside this Court's and the Government's jurisdiction. The Government sought some clarification from defense counsel as to the use of discovery in this case which would necessitate public disclosure. Instead the recent letter was submitted without response to the Government's inquiries and without referencing the Government's concerns as to its use.

Accordingly, the Government objects to the Court's granting the application and, before any action is taken by the Court, renews its request for an explanation from the defense as to what authority and for what reason they seek to unilaterally nullify an Order, consensually agreed to, for purposes

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outside the construct of the case before this Court.

Respectfully submitted,  
Rachael A. Honig  
Acting United States Attorney

*V. Grady O'Malley*

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